

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DEWANE TSE,
a/k/a "BOO"

) **09 CR 10206 WGY**
) Criminal No.
)
) VIOLATIONS:
)
) 21 U.S.C. § 841(a)(1) -
) Distribution of Cocaine
)
) 21 U.S.C. § 841 (a)(1) -
) Possession of Cocaine
) With Intent to Distribute
)
) 21 U.S.C. § 853 - Criminal
) Forfeiture

INDICTMENT

COUNT ONE (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine)

The Grand Jury charges that:

On or about May 15, 2009, at Boston in the District of
Massachusetts,

DEWANE TSE, a/k/a "BOO,"

the defendant herein, did knowingly and intentionally distribute
cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code,
Section 841(a)(1).

COUNT TWO (21 U.S.C. § 841(a)(1) -- Possession of Cocaine
With Intent to Distribute)

The Grand Jury charges that:

On or about May 15, 2009, at Boston in the District of
Massachusetts,

DEWANE TSE, a/k/a "BOO,"

the defendant herein, did knowingly and intentionally possess,
with intent to distribute cocaine, a Schedule II controlled
substance.

All in violation of Title 21, United States Code,
Section 841(a)(1).

FORFEITURE ALLEGATION
(21 U.S.C. § 853)

The Grand Jury further charges that:

1. As a result of the offenses alleged in Counts One and Two of this Indictment,

DEWANE TSE, a/k/a "BOO,"

defendant herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendant --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL,

Laura McFarland
FOREPERSON OF THE GRAND JURY

Emily Cummings
EMILY CUMMINGS
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS

July 8, 2009

Returned into the District Court by the Grand Jurors and
filed.

Maurice S. [Signature]
Deputy Clerk
11:31 7/8/09